

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

MOTION FOR A PRESENTENCE INVESTIGATION
TO BE CONDUCTED PRIOR TO PLEA

Comes now Defendant, Safya Roe Yassin, through counsel, and pursuant to Federal Rule of Criminal Procedure 32, moves this Court to order that a presentence investigation be conducted and a report be created prior to any plea of guilty in the above-referenced case.

SUGGESTIONS

Defendant is currently set for trial on the September 25, 2017, trial docket. In the continuing interest in resolving the case through negotiation, both parties believe a “pre-plea PSIR” may be beneficial in resolving some issues regarding the calculation of the USSG range.

With this in mind, Ms. Yassin would ask this Court to order the United States Probation Office to conduct a presentence investigation and submit a report of its findings.

As stated above, the government, represented by Abram McGull, has been contacted regarding this request, and has no objection to Ms. Yassin's motion for a "pre-plea PSIR."

Respectfully submitted,

/s/ Ian A. Lewis

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June 28, 2017

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of such filing to all CM/ECF participants in this case, and a copy was mailed, via the United States Postal Service, to all non-CM/ECF participants.

/s/ Ian A. Lewis

IAN A. LEWIS